

FEB 17 2000

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)	
)	
Communications Assistance for)	CC Docket No. 97-213
Law Enforcement Act)	

ERRATUM

The attached Opposition of SBC Communications Inc. (SBC) to Petition for Reconsideration was filed electronically yesterday. However, due to clerical error, service was not completed on February 7, 2000 as represented by the Certificate of Service. SBC hereby refiles the attached with proper proof of service. This pleading will be served today upon the parties to the proceeding. SBC respectfully requests that the Commission accept this erratum, as it believes that no party will be prejudiced by the one day delay in service.

Respectfully submitted,

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February 8, 2000

No. of Copies rec'd 014
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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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**OPPOSITION OF SBC COMMUNICATIONS
TO PETITION FOR RECONSIDERATION**

The Commission seeks oppositions¹ related to two Petitions for Reconsideration and/or Clarification filed by the Department of Justice/Federal Bureau of Investigation (DOJ/FBI)² and a Petition for Reconsideration and/or Clarification filed by the National Telephone Cooperative Association (NTCA). Of these filings only the DOJ/FBI's Petition for Reconsideration of Section 105 Report and Order (DOJ/FBI Petition) is of concern to SBC.³ While SBC supports certain of the DOJ/FBI's positions, it opposes the DOJ/FBI's ill-concealed attempt to include as a "security requirement" that which it was denied as an assistance capability. Specifically, it is disingenuous for law enforcement to argue that the surveillance status message capability which the Commission refused to include as part of the industry technical standard, should now be

¹ See, Notice In the Matter of Communications Assistance for Law Enforcement Act, CC Docket No. 97-213, published 65 Federal Register 3451 (January 21, 2000).

² On October 25, 1999, the DOJ/FBI filed a Petition for Reconsideration of Section 105 Report and Order relating to the Commission's Report and Order released on March 15, 1999 pertaining to systems security and integrity requirements. The DOJ/FBI further filed a Petition for Reconsideration and/or Clarification on November 12, 1999 with regard to the Second Report and Order in this proceeding.

³ SBC is not opposed to the position taken by the DOJ/FBI in its November 12, 1999 filing relating to reseller responsibilities nor does it disagree with the NTCA that a limited list of contacts rather than a single point of contact in all instances is appropriate.

mandated under the guise of a security and integrity requirement. The four issues raised in the DOJ/FBI Petition are addressed more fully below.

I. PERSONNEL SECURITY RESTRICTIONS PROPOSED BY THE DOJ/FBI ARE ADVISABLE.

The DOJ/FBI urges the Commission adopt measures to verify “the trustworthiness of carrier employees regularly involved in implementing electronic surveillance” by requiring background checks on these employees.⁴ The DOJ/FBI also would have the Commission mandate that carriers identify authorized employees and require these employees to sign non-disclosure agreements.⁵

SBC supports the modified position of the DOJ/FBI that carriers be required to perform or have performed background checks on only those employees who, as part of their regular job duties are designated to have information identifying individuals whose communications are being intercepted pursuant to lawful electronic surveillance. This limitation establishes a defensible balance between law enforcement’s need for confidentiality and an individual’s expectation of privacy. SBC also agrees that the signing of non-disclosure agreements is not an unreasonable request given the sensitivity of the information involved.

II. THE COMMISSION SHOULD NOT ORDER SURVEILLANCE STATUS MESSAGE CAPABILITY AS A “SECURITY MEASURE.”

As the DOJ/FBI freely acknowledges, it attempted to convince the Commission to include surveillance status message capability as a part of the technical industry standard and failed.⁶ Now, rather than seek reconsideration of this decision, the DOJ/FBI is trying a new tack, the adoption of this same requirement as a security measure. If the Commission were to accept

⁴ DOJ/FBI Petition, pp.3, 6-7.

⁵ DOJ/FBI Petition, pp.4-5, 7.

⁶ DOJ/FBI Petition, pp.8.

the DOJ/FBI's argument then all mandates which the Commission has refused to impose on carriers because these measures are not required by the Act, can be held to be imposed to implement the Act.

SBC does not find this distinction to be convincing. Nor should the Commission accede to the DOJ/FBI based on this disingenuous argument. To do otherwise would be to distort the law and the Commission's own procedures of review. To impose an onerous burden upon the industry in the face of the Commission's own determination that such is not within the purview of the Act would clearly be an arbitrary and undefensible action. This fact is particularly true given that normal inbound call activity will provide law enforcement with sufficient periodic messages so as to meet its objective.

III. THE COMMISSION SHOULD NOT IMPOSE A TIME LIMITATION IN WHICH A SUSPECTED COMPROMISE TO THE SYSTEM MUST BE REPORTED.

The DOJ/FBI requests the Commission require carriers to report breaches or suspected breaches in their systems to law enforcement no later than two hours after they have either discovered the breach or have a reasonable suspicion that a breach has occurred.⁷ While SBC supports a requirement for carriers to report actual compromises of security systems within a reasonable time of discovery, it does not support the arbitrary adoption of a two-hour limitation. If a breach is suspected, the carrier should move expeditiously to initiate an investigation. However, the carrier must also be permitted sufficient time to conclude this process. This assessment could take a matter of hours or days. If an actual breach is confirmed, it is at that time that law enforcement should be informed. The carrier should not be in the position of having to immediately report every suspected breach, which is what would occur if the

⁷ DOJ/FBI Petition, pp.9-10.

DOJ/FBI's subjective "reasonable suspicion" standard is adopted. The reporting of mere suspicions would lead to unwarranted action on the part of both the carrier and law enforcement and serve to take up valuable time which would more beneficially be spent in investigating the situation.

IV. THE COMMISSION SHOULD CLARIFY ITS ORDER TO REQUIRE CARRIERS TO MAINTAIN RECORDS OF INDIVIDUAL INTERCEPTIONS.

The DOJ/FBI urges the Commission to clarify its Report and Order and its resulting rules, to require carriers to maintain records of the date and time at which the interception of communications or access to call-identifying information was enabled.⁸ While records must be retained in support of a surveillance initiation, because of network limitations, a carrier is only in a position to record the date and time when a translation is placed in a switch related to the surveillance target. The carrier cannot identify when law enforcement actually initiates the interception. If an extension to the original court order authorizing the surveillance is granted, the records relating to the circuit will continue to show the original translation date and time. In addition, it is possible to record the date of the order extending the wiretap, even though the carrier would not physically make any alterations to the switch.

V. CONCLUSION

While SBC does not for the most part oppose the clarification sought by the DOJ/FBI and the NTCA, it does contest utilizing this proceeding to essentially expand the definition of the industry technical standard to include surveillance status messaging. It also urges the Commission to refrain from publishing a strict time frame in which speculative breaches must be reported. Rather, a carrier should be permitted sufficient time to investigate a suspected breach

⁸ DOJ/FBI Petition, pp.11.

and report that breach to law enforcement in a timely fashion once the breach has been confirmed.

Respectfully submitted,

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February 7, 2000

CERTIFICATE OF SERVICE

On this 7th day of February 2000, I, Mary Ann Morris, hereby certify that the Opposition of SBC Communications to Petition for Reconsideration in CC Docket No. 97-213 have been served upon the parties listed in the Service List attached to the Petition for Reconsideration.

/s/ Mary Ann Morris

February 7, 2000

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